

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

IN RE:	:	
	:	
Marcia Randazzo	:	Case No.: 14-19851AMC
	:	
Debtor (s)	:	Chapter 13

---

**EXPEDITED MOTION TO INCUR NEW DEBT**

Marcia Randazzo hereinafter referred to as "Debtor" moves this Honorable Court for an Order Allowing Debtor to Incur New Debt and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about December 16, 2014.
2. The Chapter 13 filing was assigned case number 14-19851AMC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 18, 2015.
4. Debtor is desirous of purchasing the real property known as and located at 44 W 4th Street, New Castle, Delaware 19720, hereinafter referred to as "the property."
5. On or about February 20, 2020, Debtor entered into an agreement of sale to purchase the property in the amount of \$268,500.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as "**Exhibit A.**"
6. On or about March 26, 2020, Debtor was approved for a mortgage to purchase property in the amount of \$263,636.00. A true and correct copy of the letter of approval is attached here and labeled as "**Exhibit B.**"
7. An expedited hearing is humbly requested here because the settlement date for the purchase of the subject property is scheduled for April 23, 2020.
8. Debtor has completed all payments to the Trustee and the case is currently awaiting discharge.

9. In consideration thereof, Debtor requests this Honorable court to enter an order allowing her to incur new debt to finance and purchase the property.

**WHEREFORE**, the Debtor requests an Order allowing her to incur new debt to finance the purchase of the real property located at 44 W 4th Street, New Castle, Delaware 19720.

Dated: April 16, 2020

/s/Brad J. Sadek, Esq.

Brad J. Sadek, Esq.  
Sadek and Cooper Law Offices  
Attorney for Debtor  
1315 Walnut Street  
Suite #502  
Philadelphia, PA 19107